

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

SAMSON TUG AND BARGE CO., INC.,
an Alaska Corporation

Plaintiff/Appellant

VS.

UNITED STATES OF AMERICA,

Defendant/Appellee

Case Number: A03-006 CV
Admiralty JWS

**JOINT STIPULATION OF PARTIES TO
MODIFY CERTAIN DEADLINES,
WITH PROPOSED ORDER**

COME NOW the parties hereto and respectfully propose this Stipulation and Order regarding certain deadlines in this case. Depositions and document exchanges have been ongoing in this case, and extensive document exchanges and depositions occurred in the first six months of 2007. Additional other depositions and submittal of defendants' expert report are scheduled. To accommodate the schedules of the parties, their counsel and respective experts, Counsel have conferred and agreed that a limited modification of some of the deadlines previously approved by the Court is needed. Accordingly the parties are filing this Joint Stipulation and Proposed Order to set forth their need for a modification of the case schedule in certain limited regards, and jointly respectfully request the Court's approval of the deadlines proposed herein.

THE PARTIES HEREBY STIPULATE AND AGREE AS FOLLOWS:

- (1) Defendant's expert shall file his report by July 20, 2007.
- (2) The close of discovery shall be September 28, 2007.

(3) The last date for filing dispositive motions shall be October 19, 2007.

Respectfully submitted,

Dated: July 11, 2007

/s/ Richard D. Gluck
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Dated: July 11, 2007

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Dated: July 11, 2007

/s/ Jeanne M. Franken (consent)
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